

Massachusetts, Maine, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, and Virginia.

Sidera has no affiliation with any foreign carrier in any of the destination countries for which authority is requested nor is Sidera affiliated with any dominant U.S. carrier whose services Sidera may resell. Thus, pursuant to Section 63.10(a)(1) of the Commission's Rules, 47 C.F.R. § 63.10(a)(1), Sidera should be classified as a non-dominant carrier in its provision of international service on all routes. Furthermore, as explained herein, this Application is entitled to streamlined processing under Section 63.12 of the Commission's Rules. 47 C.F.R. § 63.12.

II. PUBLIC INTEREST CONSIDERATIONS

Sidera believes that the added competition it will bring to the market will benefit the consumers of United States-international telecommunications services. These benefits include competitive pricing and increased availability of a variety of innovative service options. Therefore, grant of this Application will further the public interest.

III. INFORMATION REQUIRED BY SECTION 63.18

Sidera submits the following information, as required by Section 63.18 of the Commission's Rules, in support of this Application:

- (a) Name, address and telephone number of Applicant:

RCN New York Communications, LLC d/b/a Sidera Networks
55 Broad Street, 2nd Floor
New York, NY 10004
Tel: (212) 324-5000
Fax: (212) 324-5050

- (b) Applicant is a limited liability company organized under the laws of the State of New York.

- (c) Correspondence concerning this application should be sent to:

Jean L. Kiddoo
Danielle Burt

BINGHAM MCCUTCHEN LLP
2020 K Street, N.W.
Washington, DC 20006-1806
Tel: (202) 373-6000
Fax: (202) 373-6001
Email: jean.kiddoo@bingham.com
danielle.burt@bingham.com

- (d) Sidera currently holds domestic Section 214 authority and global resale international Section 214 authority pursuant to File No. ITC-214-20001128-00698.
- (e) Sidera requests global Section 214 authority to operate as a facilities-based international carrier pursuant to Sections 63.18(e)(1) of the Commission's Rules. Sidera requests such authorization for all international routes authorized by the Commission.
- (f) Sidera seeks Section 214 authorization to provide only the services referenced under paragraph (e) of Section 63.18 of the Commission's Rules.
- (g) Sidera will use previously authorized facilities to provide the services requested by the Application. Consequently, Sidera is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules. 47 C.F.R. § 1.1306.
- (h) The following entities directly or indirectly own at least 10 percent of the equity of the Applicant.

- (1) The following entity owns or controls ten percent (10%) or more of the equity of **RCN New York Communications, LLC d/b/a Sidera Networks**:

Name: RCN Corporation
Address: 55 Broad Street, 2nd Floor
New York, NY 10004
Citizenship: U.S. (Delaware corporation)
Percentage Owned: 100%
Principal Business: Telecommunications Company

- (2) The following entity owns or controls ten percent (10%) or more of the equity of **RCN Corporation**:

Name: Yankee Metro Parent, Inc.
Address: c/o ABRY Partners, LLC
111 Huntington Avenue, 30th Floor

Boston, MA 02199
Citizenship: U.S. (Delaware Corp.)
Percentage Owned: 100%
Principal Business: Holding Company

- (3) The following entity owns or controls ten percent (10%) or more of the equity of **Yankee Metro Parent, Inc.:**

Name: Yankee Metro Partners, LLC
Address: c/o ABRY Partners, LLC
111 Huntington Avenue, 30th Floor
Boston, MA 02199
Citizenship: U.S. (Delaware LLC)
Percentage Owned: 100%
Principal Business: Holding Company

Yankee Metro Partners, LLC is majority-owned by ABRY Partners VI, L.P., a Delaware limited partnership, and ABRY Senior Equity III, L.P., a Delaware limited partnership.

ABRY Partners VI, L.P. holds all voting interests in Yankee Metro Partners, LLC. The sole general partner of ABRY Partners VI, L.P. is ABRY VI Capital Partners, L.P., a Delaware limited partnership. The sole general partner of ABRY VI Capital Partners, L.P. is ABRY VI Capital Investors, LLC, a Delaware limited liability company. The sole owner of ABRY VI Capital Investors, LLC is Royce Yudkoff, a citizen of the United States.

No investor in ABRY Partners VI, L.P. or ABRY Senior Equity III, L.P. holds a 10% or greater indirect ownership stake in Yankee Metro Parent, Inc., and there are, therefore, no reportable owners of ABRY Partners VI, L.P. or ABRY Senior Equity III, L.P. Royce Yudkoff ultimately controls the general partners of each of ABRY Partners VI, L.P. and ABRY Senior Equity III, L.P.

ABRY Partners VI, L.P. and ABRY Senior Equity III, L.P., together have a majority ownership of Yankee Metro Parent, Inc. ABRY Partners VI, L.P. has sole voting rights in Yankee Metro Parent, Inc., and no other investor has a 10% or greater equity ownership stake in Yankee Metro Parent, Inc.

The principal place of business for Yankee Metro Parent, Inc., Yankee Metro Partners, LLC, ABRY Partners VI, L.P., ABRY Senior Equity III, L.P., ABRY VI Capital Partners, L.P., ABRY VI Capital Investors, LLC, and Royce Yudkoff is c/o ABRY Partners, LLC, 111 Huntington Avenue, 30th Floor, Boston, Massachusetts 02199.


- (4) No other entity directly or indirectly owns at least 10 percent of the equity of RCN New York Communications, LLC d/b/a Sidera Networks. Applicant does not have any interlocking directorates with a foreign carrier.
- (i) Sidera certifies that it is not affiliated with a foreign carrier.
- (j) Sidera certifies that it does not seek to provide international telecommunications services to any destination country for which any of the following is true:
 - (1) The Applicant is a foreign carrier in that country; or
 - (2) The Applicant controls a foreign carrier in that country; or
 - (3) Any entity that owns more than twenty-five percent (25%) of Applicant, or that controls the Applicant, controls a foreign carrier in that country.
 - (4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than twenty-five percent (25%) of Applicant and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.
- (k) Not applicable.
- (l) Not applicable. Applicant does not propose to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country where it is a foreign carrier or is affiliated with a foreign carrier.
- (m) Not applicable.
- (n) Sidera certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier where the foreign carrier possesses market power on the foreign end of the route and Sidera will not enter into such agreements in the future.
- (o) Sidera certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862), it is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) Sidera respectfully requests streamlined processing of this Application pursuant to Section 63.12 of the Commission's Rules. 47 C.F.R. § 63.12. This Application qualifies for streamlined processing for the following reasons: (1) Sidera is not

affiliated with a foreign carrier on any route for which authority is sought; (2) Sidera is not affiliated with any dominant U.S. carrier whose international switched or private lines services it seeks to resell; and (3) Sidera is not requesting authority to provide switched service to countries not previously authorized for service by the Commission.

IV. CONCLUSION

For the reasons stated above, RCN New York Communications, LLC d/b/a Sidera Networks respectfully submits that the public interest, convenience, and necessity would be furthered by a grant of this Application.

Respectfully submitted,



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Counsel for RCN New York Communications,
LLC d/b/a Sidera Networks

Dated: October 19, 2010

CERTIFICATION OF APPLICANT

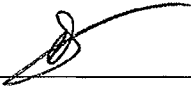
I hereby certify, on behalf of RCN New York Communications, LLC, d/b/a Sidera Networks ("Sidera") with respect to the foregoing application for section 214 authority to provide international facilities based services, that to the best of my knowledge, information and belief:

1. Sidera is not affiliated with any foreign carrier in any of the countries to which Sidera proposes to provide service in the foregoing application.
2. Sidera will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
3. Sidera does not seek to provide international telecommunications service to any destination where: (1) Sidera is a foreign carrier in that country; (2) Sidera controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in Sidera, or controls Sidera, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of Sidera and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. Sidera has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
5. Sidera is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
6. The contents of the Application are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19 day of October, 2010.

RCN New York Communications, LLC
d/b/a Sidera Networks

By: _____


Name: Michael T. Sicoli
Title: Chief Executive Officer